# **REMARKS**

The present application includes claims 1-3, 5-20, 92-93, 95-96, 100-101, 104-120, 123-125, 128-134, 136-138 and 140-162. Claim 1 was amended. Claims 126 and 127 were cancelled to reduce costs. Claim 163 is new and finds support in the paragraph bridging pages 15 and 16.

#### Rejections

Claims 1, 3, 5-13, 19-20, 95, 100, 104-112, 114-120, 123-134, 136-137, 140 and 142-159 are rejected under 35 U.S.C. 103(a) as being unpatentable over Osaku et al. (U.S. patent 6,061,738) in view of "Internationalization of Domain names" and further in view of Hedin et al. (EU 0387226 A1).

Claims 2, 14, 92, 101, 113 and 141 are rejected under 35 U.S.C. 103(a) as being unpatentable over Osaku et al. (U.S. patent 6,061,738) in view of "Internationalization of Domain names", in view of Hedin et al. (EU 0387226 A1) and further in view of Cummings.

Claims 16-18, 93, 96, 138, 161 and 162 are rejected under 35 U.S.C. 103(a) as being unpatentable over Osaku et al. (U.S. patent 6,061,738) in view of "Internationalization of Domain names", in view of Hedin et al. (EU 0387226 A1) and further in view of Jacobson et al. (US patent 6,070,157).

Claim 15 is rejected under 35 U.S.C. 103(a) as being unpatentable over Osaku et al. (U.S. patent 6,061,738) in view of "Internationalization of Domain names", in view of Hedin et al. (EU 0387226 A1) and further in view of Cummings and further in view of Jacobson et al. (US patent 6,070,157).

## General discussion of prior art

Before relating to the rejections of the specific claims, applicants provide a summary of the art being discussed. The art is divided by applicants into three groups of references.

A first group of references relates to use of alternative representations of web addresses. This group includes:

- 1) Osaku which suggests using simplified network addresses.
- 2) Cummings which suggests using keywords which instantly send a user to a web site using a keyword which is easier to remember than a URL.
  - 3) "internationalization of DN" which suggests using URLs in non-Latin characters.

A second group includes references that suggest performing searches that provide a list of site links. This group includes:

- 4) Cummings (same as (2) above) which suggests performing a search and providing a plurality of search results for unregistered key words.
- 5) Jacobson which suggests providing search results accompanied by additional attributes or filtered by an attribute value (Fig. 4).

The third group relates to use of natural language for accessing a database and includes:

6) Hedin which describes using vocabulary and grammar to check an input sentence or expression for syntactical validity (page 13, lines 48-49) in natural language analyzing apparatus for use with a database containing tables.

#### Independent claim 1

Regarding claim 1, applicants respectfully traverse the rejection and state that the Examiner has not established a *prima facie* case of obviousness, as the Examiner has not provided a teaching or motivation to combine Osaku and "internationalization of DN" with Hedin.

Claim 1 was amended for clarity to separate the correcting of the spelling from the providing of the address. In addition, claim 1 was amended to remove the term translation and to remove the requirement that the information is in a non-Latin language. This amendment broadens claim 1.

The Examiner stated that it would be obvious to use Hedin's teachings of natural language analysis with the method of Osaku in order to facilitate verification of the interpretation of an input expression. Applicants respectfully disagree. Osaku, as well as all the other references of group 1, relate to pre-assigned codes assigned to specific web addresses in order to facilitate access to specific web addresses. When dealing with codes, they could be formed of natural language words, but could just as well be formed of names or meaningless sequences of numbers or letters. See, for example, Osaku abstract, col. 2, line 6, col. 4, lines 13-20, and the letter and number sequences on cols. 16 and 17. It is therefore not clear at all whether there is anything to gain from applying spell correction to the codes and absent a specific teaching to do so it would not be performed by those skilled in the art. Furthermore, in some cases, codes (e.g., commercial trademarks) that are not included in a spell checker dictionary are similar to words that do appear in the dictionary. It therefore would not be obvious to apply spell correction to the codes of Osaku. Applicants note that Hedin relates to a totally different context in which the user enters commands in a natural language, which could benefit from spell correction, and not codes which do not benefit from

spell correction.

Furthermore, Osaku and Cummings both suggest how to operate when an input does not match any of the pre-assigned keywords. Cummings states that if the input is not a keyword, results of a search for the input are provided to the user. Cummings does not teach or suggest directly displaying a page for an input that does not match a pre-assigned keyword. Osaku (Fig. 23) states that a "not found" message is provided when a code is not found and does not teach or suggest any attempt to correct for an incorrect code. Given solutions for cases in which a match was not found, there is no reason to use a spell checker in such cases, or at all.

#### Independent claim 14

Regarding claim 14, applicants respectfully traverse the rejection and state that the Examiner has not established a *prima facie* case of obviousness, since the Examiner has not related to at least one limitation of claim 14.

Claim 14 requires providing entered information typed by the user along with userdependent information not entered by the user in a session in which the information is entered. In Osaku, "Internationalization of Domain names", Hedin and Cummings, the user only enters information used for the search and applicants did not find additional information not entered in the session that is provided to the software.

### Independent claim 16

Regarding claim 16, applicants respectfully traverse the rejection and state that the Examiner has not established a *prima facte* case of obviousness, since the Examiner has not provided a teaching or motivation to combine Osaku and "Internationalization of Domain names" with Jacobson.

Claim 16 requires providing a page address responsive to entered information and a determined geographical location, and directly displaying the page referenced by the page address.

The Examiner stated that it would be obvious to combine the teachings of Osaku and "Internationalization of Domain names" as to displaying a page responsive to an entered code, with the teachings of Jacobson of using a geographical attribute in a search. Applicants respectfully disagree and state that there is no reason to combine the references, there is no teaching in the art to combine the references and in fact it is not clear how the references can be combined at all.

The references of group 1 above (including Osaku and "Internationalization of Domain

names") relate to entering codes which represent a specific page address. The codes relate to specific addresses in accordance with a pre-assigned scheme and do not leave room for using additional attributes for aiding in the translation.

Jacobson, on the other hand, relates to performing a search in which the user receives a plurality of results. The results are filtered by an attribute provided by the user in order to reduce the amount of results provided. No where, however, does Jacobson teach or suggest displaying a single page appearing in the results.

The teachings of these references are fundamentally different and applicants do not know of any prior art reference stating that they should be combined or teaching how they can be combined. Possibly, combining the references would allow a user to provide a code and an attribute value and receive a notification as to whether the page referred to by the code meets the attribute value. This, however, is not what is required by claim 16.

#### Independent claim 140

Regarding claim 140, applicants respectfully traverse the rejection and state that the Examiner has not established a *prima facie* case of obviousness, since the Examiner has not shown a teaching of at least one limitation of claim 140.

Claim 140 requires selecting, by a translator, a unique page address from a plurality of determined page addresses. This is not taught or suggested by any of the cited references. The Examiner referred to "Internationalization of Domain names", page 7, lines 27-37, as teaching this limitation. Applicants note, however, that the passage on page 7, lines 27-37, which is titled "general usage", does not relate to selecting a unique page address from a plurality of determined page addresses, but rather relates to web browsers performing a 1:1 conversion from non-Latin characters to the format defined by the reference and also in the opposite direction (the gethostbyname() function).

# Dependent claims

The dependent claims are allowable at least by the virtue of their parent claim. For brevity, applicants are not listing claims which add further patentability over the art.

# Conclusion

In view of the above remarks, applicants respectfully await allowance of the claims. In the event that the Examiner finds any further problems, which would make it impossible to issue an allowance for all the claims, the Examiner is respectfully requested to call the undersigned at 1 (877) 428-5468, which is a US toll free number connected directly to our office in Israel (please note the 7 hour time difference and the official work week is from Sunday to Thursday).

Respectfully submitted, Aviv REFUAH et al.

Yaakov Schatz Yaakov Schatz Reg. No. 44,320

November 21, 2005 William H. Dippert, Esq. Wolf, Block, Schorr & Solis-Cohen LLP 250 Park Avenue New York, NY 10177